

**REMARKS**

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The final Office Action dated January 19, 2007, has been received and its contents carefully reviewed.

By this Amendment, Applicants have amended claims 1, 6, 11 and 17, and cancelled 10 and 21 without prejudice or disclaimer. Accordingly, claims 1-9 and 11-20 are currently pending. Reexamination and reconsideration of the pending claims is respectfully requested.

In the Office Action, claims 1-5, 10-16 and 21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,739,880 to Suzuki et al. in view of U.S. Patent No. 5,818,550 to Kadota et al.; claims 6-9 and 17-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Suzuki et al. and Kadota et al. in view of U.S. Patent No. 5,481,388 to Aoya.

The rejection of claims 1-5, 10-16 and 21 is respectfully traversed and reconsideration is requested.

Claim 1 is allowable over the cited references in that claim 1 recites a combination of elements including, for example, "...a black matrix formed of an organic resin material, at a predetermined region of a first substrate and at a boundary region of pixels... wherein a thickness of the over-coat layer is between approximately about 1.2 $\mu$ m to about 5 $\mu$ m, said thickness on the first substrate absorbing an external force, and preventing compression or depression of the black matrix." None of the cited references, singly or in combination, teaches or suggests at least the aforementioned feature of the claimed invention. Accordingly, Applicants respectfully submit that claim 1 and claims 1-4, which depend therefrom, are allowable over the cited references.

On page 3 of the Office Action, the Examiner admits that Suzuki et al. fails to teach the aforementioned features recited in claim 1. Then, the Examiner cites Kadota et al. to cure the deficient teaching of Suzuki et al.

In the present application, the over-coat layer formed of an organic material and having a thickness of 1.2 $\mu$ m to about 5 $\mu$ m functions as a buffer layer absorbing the external pressure and

preventing depression of the black matrix formed on an organic material, thereby minimizing or preventing a crack that may be generated near the black matrix made of an organic material on the color filter substrate due to an external pressure. See, for example, the present application at paragraph [0081]. In contrast, the black mask 8 in Kadota et al. is made of a metal, not an organic material, and is formed on the transistor substrate, not on the color filter substrate. See Kadota et al. at Col. 4, lines 10-16 and Fig. 1. Accordingly, Applicants respectfully submit that the citation of Kadota et al. actually teaches away from the teachings of the present application, and that one of ordinary skill would not be motivated to combine Suzuki et al. and Kadota et al. and arrive at the claimed invention with any reasonable expectation of success.

Claim 11 is allowable over the cited references in that claim 11 recites a combination of elements including, for example, "...a black matrix made of an organic resin material, and at a predetermined region of a first substrate and a boundary region of pixels... wherein a thickness of the over-coat layer is between approximately about 1.2 $\mu$ m to about 5 $\mu$ m, said thickness on the first substrate absorbing an external force, and preventing compression or depression of the black matrix." None of the cited references, singly or in combination, teaches or suggests at least the aforementioned feature of the claimed invention. Accordingly, Applicants respectfully submit that claim 11 and claims 12-16, which depend therefrom, are allowable over the cited references.

The rejection of claims 6-9 and 17-20 is respectfully traversed and reconsideration is requested. Because Aoya fails to cure the deficient teachings of Suzuki et al. and Kadota et al. as discussed with claims 1 and 11, claims 6-9 and 17-20, which depend from claim 1 or claim 11, are allowable over the cited references.


Accordingly, Applicants believe the application is in condition for allowance and early, favorable action is respectfully solicited. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. § 1.136, and any additional fees required under 37 C.F.R. § 1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. *A duplicate copy of this sheet is enclosed.*

Respectfully submitted,

Dated: 19 April 2007

By



Eric J. Nuss

Registration No. 40,106

McKENNA LONG & ALDRIDGE LLP

1900 K Street, N.W.

Washington, DC 20006

(202) 496-7500

Attorneys for Applicant